

Date: July 13, 2020

TO WHOMSOEVER IT MAY CONCERN

This is to confirm and certify that, Hamburg Sudamerikanische Dampfschiffahrts-Gesellschaft A/S & CO KG ("**the Company**") is a Company incorporated in Denmark under the provisions of Danish Companies Act.

We further confirm and certify that the Company is a Tax Resident in Denmark and under Article 9 of the Agreement for Avoidance of Double Taxation i.e. DTAA between India and Denmark; profits derived by the Company from the operations of ships in International Traffic are exempt from tax in India.

In view of the above and the clarification issued by the CBDT vide Circular no 723 dated 19th September 1995 the provisions of Section 194C and Section 195 of the Income Tax Act, 1961, deduction of tax at source shall not be applicable in respect of freight charges, terminal handling charges, inland haulage charges or any amount of similar nature payable to the Company for FY 2020-2021 (Relevant for Assessment Year 2021-2022).

We hereby confirm that we are complying with the provisions of section 172 of the income tax act, 1961

Sincerely,

For Hamburg Sud India Private Limited

(As Agents of Hamburg Sudamerikanische Dampfschiffahrts-Gesellschaft A/S & CO KG)



Authorized Signatory

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